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LATHAM & WATKINS LLP

APPLICATION GRANTED
SO ORDERED

February 3, 2023


John G. Koeltl, U.S.D.J.

2/6/23
Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

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Re: Atos Syntel Inc. et al. v. Ironshore Indemnity Inc., Case No. 1:21-cv-01576-JGK

Dear Judge Koeltl:

On behalf of Plaintiffs Atos Syntel Inc., Syntel Holding (Mauritius) Ltd., and Syntel LLC ("Plaintiffs" or "Syntel"), we write pursuant to Rule VI.A.2 of the Court's Individual Practices to request the permanent sealing of certain papers that we will be filing today in support of Plaintiffs' Opposition to Defendant Ironshore's Motion for Summary Judgment.

Pursuant to the Local Rules, we will also publicly file redacted versions of the following Exhibits to my Declaration in Support of Plaintiff's Opposition to Summary Judgment ("McLaughlin Dec."):

- Exhibit 3 (bates-stamped Syntel-00039100-02); and
- Exhibit 7 (Plaintiffs' Supplemental Objections and Responses to Defendant's First Set of Interrogatories).

Exhibit 3 contains non-public and commercially sensitive information about Plaintiffs' customer list. The unredacted version of this document should remain under seal because it identifies a customer of Plaintiffs that operates in sensitive industries and whose contracts may be the subject of non-disclosure agreements. Exhibit 7 contains non-public information that is central to ongoing litigation in the Second Circuit Court of Appeals and the Delaware Court of Chancery. The unredacted version of this exhibit should remain under seal because the disclosure of this information is potentially prejudicial to parties in those actions.

We will also file a redacted Response to Defendant's Rule 56.1 Statement of Undisputed Material Facts, the original version of which was filed under seal (ECF No. 59); this document includes Plaintiffs' Counterstatement of Additional Undisputed Material Facts, one fact of which is also requested to be filed under seal because it references Exhibit 7 (above).

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We appreciate the Court's consideration of this request.

Respectfully,

A handwritten signature in black ink, appearing to read "T. J. McLaughlin", written in a cursive style.

Timothy J. McLaughlin (admitted *pro hac vice*)
LATHAM & WATKINS LLP

cc: All Counsel of Record (via CM/ECF)